

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

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|-------------------|---|--------------------------|
| In the Matter of: |) | |
| |) | Case No. 16-31244-DHW-13 |
| DEBRA F. PURIFORY |) | |
| |) | Chapter 13 |
| Debtor(s). | | |

OBJECTION TO CONFIRMATION

COMES NOW your petitioner, Credit Acceptance Corp (hereinafter referred to as "Credit Acceptance"), a secured creditor in the above styled cause, and files this objection to the proposed plan filed by the Debtor, and as grounds therefore, states as follows:

1. That Credit Acceptance is the holder of a perfected security interest in the Debtor's property, more specifically described as **one (1) 2006 Nissan Muran, VIN: JN8AZ08T26W417316**. As evidence of the perfection, Credit Acceptance attaches to this objection a copy of the Retail Installment Sales Contract and Certificate of Title, collectively as Exhibit A and incorporates said documents herein by reference.

2. That the payoff on Credit Acceptance's collateral on the date of the filing of this petition was \$11,509.71.

3. That the Debtor's proposed value is not in compliance with 11 U.S.C. § 1325(a)(9) of the Bankruptcy Code.

4. That the Debtor has failed to provide sufficient adequate protection payments to Credit Acceptance in compliance with 11 U.S.C. § 1326 of the Bankruptcy Code.

5. That the plan proposed by the Debtor fails to propose a sufficient interest rate.

6. That the interest of Credit Acceptance is not adequately protected by the Debtor's plan as proposed.

Purifory; File #16-06102-BK

WHEREFORE, PREMISES CONSIDERED, Credit Acceptance respectfully requests this Honorable Court for an Order denying confirmation of the Debtor plan as proposed, and for such further and other relief as this Court deems proper.



Paul J. Spina, III,
Attorney for Credit Acceptance Corp.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing Objection to Confirmation upon the following by placing the same in the U.S. Mail, postage pre-paid, or via ECF e-mail on this the 24th day of **June, 2016**.



OF COUNSEL

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